

1 [Stipulating parties listed on signature page]  
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7 UNITED STATES DISTRICT COURT  
8 NORTHERN DISTRICT OF CALIFORNIA  
9 SAN FRANCISCO DIVISION

10 INTRI-PLEX TECHNOLOGIES, INC.,

Case No. 3:17-cv-01097-EMC

11 Plaintiff,

12 v.

**STIPULATION AND [CORRECTED]  
[PROPOSED] ORDER REGARDING  
INITIAL DISCLOSURES**

13 NHK INTERNATIONAL CORPORATION;  
14 NHK SPRING CO., LTD.; OGAKI SEIKO CO.,  
LTD.; AND SEIKO HIGH TEC CORP.

15 Defendants.  
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17  
18 WHEREAS, Plaintiff Intri-Plex Technologies, Inc. (“Plaintiff”) filed its complaint on  
19 March 3, 2017 naming as Defendants NHK International Corporation (“NHK International”),  
20 NHK Spring Co., LTD. (“NHK Spring”), Ogaki Seiko Co., LTD. (“Ogaki Seiko”) and Seiko  
21 High Tec Corp. (“Seiko High Tec”) (collectively, the “Defendants”) (D.I. 1);

22 WHEREAS, on March 6, 2017, the Court issued an Order Setting Initial Case  
23 Management Conference and ADR Deadlines (D.I. 7) setting May 10, 2017 as the deadline to  
24 hold a Rule 26(f) conference, May 24, 2017 as the deadline for the Initial Disclosures and the  
25 Joint Case Management Statement, and May 31, 2017 for the Initial Case Management  
26 Conference;

27 WHEREAS, on March 27, 2017, the Court issued an Order Regarding Service of Process  
28 (D.I. 20) moving the time to answer the complaint to June 7, 2017;

WHEREAS, the Defendants have not yet filed an answer to the complaint;

1 WHEREAS, on May 10, 2017, the parties held their Rule 26(f) conference;

2 WHEREAS, on May 11, 2017, the Court issued an Order Reassigning Case (D.I. 29)  
3 reassigning this case to the Honorable Judge Edward M. Chen and vacating the previously-  
4 scheduled Initial Case Management Conference;

5 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by the parties  
6 that:

7 1. Notwithstanding the times set forth in the Order Setting Initial Case Management  
8 Conference and ADR Deadlines (D.I. 7), the deadline for the Initial Disclosures shall be June 7,  
9 2017; and

10 2. No other dates or deadlines shall be modified by this stipulation and order.

11 DATED: May 25, 2017

SIMPSON THACHER & BARTLETT LLP

13  
14 By: /s/ Jeffrey E. Ostrow

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20 *Attorneys for Plaintiff Intri-Plex*  
21 *Technologies, Inc.*

22  
23 DATED: May 25, 2017

FORAN GLENNON PALANDECH  
24 PONZI & RUDLOFF PC

25 By: /s/ Marjie D. Barrows

26 Marjie D. Barrows  
27 *Attorneys for Defendants NHK International*  
*Corporation; NHK Spring Co., Ltd.; Ogaki*  
28 *Seiko Co., Ltd.; Seiko High Tec Corp.*

1                                   **ATTESTATION OF CONCURRENCE IN FILING**

2                   Pursuant to the Northern District of California's Local Rule 5-1(i)(3), I attest that all  
3 signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and  
4 have authorized the filing.  
5

6 Dated: May 25, 2017

SIMPSON THACHER & BARTLETT LLP

7  
8 By: /s/ Jeffrey E. Ostrow  
Jeffrey E. Ostrow

9                                   *Attorney for Plaintiff Intri-Plex*  
10                                   *Technologies, Inc.*  
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1 **[~~PROPOSED~~] ORDER**

2 Pursuant to foregoing stipulation, IT IS SO ORDERED that the deadline for the Initial  
3 Disclosures shall be June 7, 2017.

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5 Dated: 5/26, 2017

